



THE CITY OF NEW YORK  
LAW DEPARTMENT

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April 28, 2025

**BY ECF**

Honorable Jennifer E. Willis  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Amaury Urena v. City of New York, et al.,  
24 Civ. 1880 (JAV) (JW)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney for defendant City of New York ("City") in the above captioned matter. Defendant City writes (1) to respect request an adjournment of the initial case management conference scheduled for May 12, 2025 *sine die* as defendant anticipates filing a fully dispositive motion to dismiss as a result of a General Release signed by plaintiff and (2) to respectfully renew their request that the Court endorse a briefing schedule with respect to defendants' anticipated fully dispositive motion to dismiss. I was unable to expeditiously reach plaintiff with respect to these requests as he is proceeding *pro se* and is currently incarcerated.

By way of background, on March 12, 2024, plaintiff brought this action, pursuant to 42 U.S.C. § 1983, asserting various claims arising from his arrest on or about December 12, 2023. See ECF No. 1. On March 25, 2025, defendant City filed a letter requesting that Your Honor endorse a briefing schedule for defendants' anticipated fully dispositive motion to dismiss. See ECF No. 24. On March 27, 2025, the Court issued an Order scheduling an initial case management conference for May 12, 2025. See ECF No. 25. However, the Court has not ruled on defendants' request for a briefing schedule.

As previously explained, and as explained herein, defendant City intends to move to dismiss the Complaint in its entirety because, *inter alia*, plaintiff's claims are barred by a General Release he signed on or about November 1, 2024.

Accordingly, defendant City respectfully requests that the Court endorse the following proposed briefing schedule for their anticipated motion to dismiss:

- Motion papers served and filed by May 9, 2025;<sup>1</sup>
- Opposition papers served and filed by June 9, 2025; and
- Reply papers, if any, served and filed by June 25, 2025.

Defendant City further respectfully requests that the Court adjourn *sine die* the May 12, 2024 initial case management conference, pending resolution of defendants' fully dispositive motion to dismiss.

Thank you for your consideration herein.

Respectfully submitted,

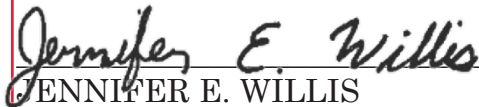
/s/ Randy Nandlall

Randy Nandlall  
Assistant Corporation Counsel  
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cc: **BY FIRST CLASS MAIL**

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Plaintiff *pro se*  
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09-09 Hazen Street  
East Elmhurst, NY 11370

The request is **DENIED** without prejudice. Defendant is to attempt in good faith to confer with Plaintiff before requests for adjournments or extensions. See Individual Practices in Civil Cases, Section I, Subsection C. SO ORDERED.



JENNIFER E. WILLIS  
UNITED STATES MAGISTRATE JUDGE  
May 5, 2025

<sup>1</sup> The undersigned respectfully requests an additional week of time from the previous proposed briefing schedule to serve and file their motion to dismiss due to previously scheduled leave.